

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK
VARIABLE LIFE INSURANCE
COMPANY, and MANULIFE
INSURANCE COMPANY (f/k/a
INVESTORS PARTNER LIFE INSURANCE
COMPANY),

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

CIVIL ACTION NO. 05-11150-DPW

**JOINT MOTION REGARDING REVISED BRIEFING SCHEDULE FOR
FILING OPPOSITION AND REPLY TO ABBOTT'S MOTION TO STRIKE**

Pursuant to Federal Rules of Civil Procedure 6(b) and 7, and Local Rule 7.1, plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a/ Investors Partner Life Insurance Company) (collectively, "John Hancock" or "Plaintiffs") and defendant Abbott Laboratories ("Abbott") (collectively, the "Parties") hereby submit this Joint Motion Regarding Revised Briefing Schedule for Filing Opposition and Reply to Abbott's Motion to Strike the Prayer for Rescission in the First Amended Supplemental Complaint ("Motion to Strike"). For the following reasons, the Parties respectfully request that this Motion be granted:

1. On January 12, 2007, Abbott filed its Motion to Strike.

2. Under the applicable rules, Plaintiffs' opposition to the Motion to Strike is due on or before January 26, 2007.

3. In order to allow adequate time for filing, particularly in light of depositions scheduled during this period, Plaintiffs respectfully request that this deadline be extended two (2) weeks to February 9, 2007.

4. Abbott requests the opportunity to file a reply brief in response to Plaintiffs' opposition to the Motion to Strike because it believes a reply brief will assist the Court by addressing arguments and issues likely to be raised in John Hancock's opposition.

5. In order to allow adequate time for filing, particularly in light of depositions scheduled during this period, Abbott requests the Court set a deadline of March 2, 2007 for filing the reply brief.

WHEREFORE, the Parties jointly and respectfully request that the Court grant this Motion and issue an order stating that John Hancock may file its opposition to the Motion to Strike on or before February 9, 2007, and Abbott may file a reply in support of the Motion to Strike on or before March 2, 2007.

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY,
and MANULIFE INSURANCE COMPANY

By their attorneys,

/s/ Stacy L. Blasberg

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Date: January 23, 2007

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel for Plaintiffs hereby certifies that, on January 23, 2007, counsel for John Hancock and counsel for Abbott conferred in good faith in an effort to resolve or narrow the issues that are the subject of this Motion, and an agreement was reached by the parties.

/s/ Stacy L. Blasberg
Stacy L. Blasberg

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that paper copies will be sent to those non-registered participants (if any) on January 23, 2007.

/s/ Stacy L. Blasberg
Stacy L. Blasberg

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